



RARITAN PLAZA #1  
4TH FLOOR  
RARITAN CENTER  
EDISON, NEW JERSEY 08837  
PHONE: 908-225-3990  
FAX: 908-225-3240

17 December 1991

Ms. Christina Purcell  
Case Manager  
Bureau of Federal Case Management  
Division of Responsible Party Site Remediation  
CN 028  
Trenton, New Jersey 08625-0028

W.O. No: 3600-06-20

**Re: Confirmation of Understanding Regarding the Revisions to the  
L.E. Carpenter Baseline Risk Assessment**

Dear Ms. Purcell:

The purpose of this letter is to confirm our understanding regarding the issues discussed on 4 December 1991 relative to the L.E. Carpenter Baseline Risk Assessment (RA) dated September 1991. The meeting was requested by Roy F. Weston Inc. (WESTON), on behalf of L.E. Carpenter and Company, in order to outline the resolutions to comments by the New Jersey Department of Environmental Protection and Energy (NJDEPE) dated 8 November 1991. The overall objective of the meeting was to ensure that WESTON's revisions to the RA will satisfy NJDEPE's request and that this revision is the final revision. The following summarizes WESTON's responses to each of the NJDEPE comments in the order that they are presented in the November 8, 1991 letter.

Comment

Response

1. WESTON has utilized the geometric mean to compare site related inorganic analyte levels to background concentrations in order to screen out contaminants of concern. As agreed upon, WESTON will continue utilizing the geometric mean for comparison purposes. The following inorganic analyses will be included in the risk assessment: antimony, cadmium, chromium, copper, mercury, nickel, silver, and thallium.  
  
Based upon the geometric mean comparison, lead will not be included in the site risk calculations. L.E. Carpenter recognizes that there are areas on-site with elevated levels of lead. Those areas will be considered "hot-spots" in the Feasibility Study (FS) and the application of state soil action levels will be used as the basis for development a clean-up goal.  
  
A qualitative assessment of lead will be developed and included in the uncertainty section of the RA. That qualitative assessment will include a discussion of the under/overestimation of risk, a toxicological evaluation and identification of preliminary clean-up goals.
2. The "hot-spot" analysis will be removed from the RA. Those metals identified in #1 will be included in the body of the RA.
3. The statement as requested will be deleted from the text.

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4. The statements regarding lead in stream sediments, surface water, and groundwater will be revised to more accurately reflect actual site conditions.  
  
The statements regarding PAHs detected in stream sediments will be revised to more accurately reflect site conditions.
5. The reference will be deleted. WESTON incorrectly cited RAGS.
6. This comment was discussed and concluded in #1. WESTON, as agreed upon, will continue with the geometric mean comparison since the data appears to be log normally distributed. Based upon this comparison, inorganic chemicals of concern will be screened for inclusion in the body of the RA.
7. A qualitative assessment of lead will be included in the RA.
8. Stronger justification will be developed to explain the use of geometric mean for the selection of contaminants of concern in the Ecological Assessment. WESTON will evaluate the distribution of the data and present a discussion in the uncertainty section.
9. The values for copper and antimony presented in table 6.5 will be revised.

I trust that these responses will meet with your approval. Consistent with your letter dated 6 December 1991, L.E. Carpenter will submit for your review the Final Baseline Risk Assessment on or before 8 February 1992. If you have any questions regarding the responses outlined above, please call me at 908-225-3990.

Sincerely,

ROY F. WESTON, INC.

  
Martin J. O'Neill, CHMM  
Project Manager

c: R. Warwick, WESTON  
V. Cappello, WESTON  
C. Anderson, L.E. Carpenter  
J. Josephs, USEPA  
B. Lowey, NJDEPE - BEERA  
J. Prendergast, NJDEPE - BEERA